

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

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**UNITED STATES OF AMERICA**

**v.**

**JOSEPH CARAMADRE, and  
RAYMOUR RADHAKRISHNAN**

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**Criminal No. 1:11-cr-00186-S**

**MOTION TO WITHDRAW  
NOTICE OF APPEAL**

Now comes the Defendant, through counsel, and moves this Honorable Court to withdraw the notice of appeal of the May 20, 2013 denial of the Defendant's motion to withdraw his guilty plea, without prejudice to re-filing after sentencing. After conferring with the United States Attorney, the parties agree that the appeal of the denial of the motion to withdraw the guilty plea will be properly a subject of the case appeal after sentencing.

Respectfully submitted,  
Joseph Caramadre,  
By his attorney,

/s/ Randy Olen

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**CERTIFICATION**

I hereby certify that on this 23<sup>rd</sup> day of May, 2013, I caused to be delivered, via electronic delivery, the within ***Motion*** to:

John P. McAdams, Esq.  
U.S. Attorney's Office  
50 Kennedy Plaza, 8<sup>th</sup> Floor  
Providence, RI 02903

Lee Vilker, Esq.  
U.S. Attorney's Office  
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Olin W. Thompson, Esq.  
Federal Defender's Officer  
10 Weybosset Street, Suite 300  
Providence, RI 02903

/s/ Randy Olen

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